



## V. PROMOTING A SUCCESSFUL TEMPORARY RELOCATION WITH THE COMMUNITY

### A. Communication is a Key to Success

Effective communication is the key to a successful temporary relocation. This communication can be done by the Team in two ways: through public meetings or one-on-one interviews. Public meetings are best for notifying residents of general plans; one-on-one interviews are best for discussing family-specific assistance and individual concerns. It is best if more than one, but not more than two or three, Team members attend both public meetings and the one-on-one interviews to assure that the discussions are recorded fully and accurately and to assure that consistent information is provided. These Team members should serve as the community's primary contacts for relocation issues.

During the first few public meetings and one-on-one interviews with residents, many Regions have found it best to spend more of the time listening to residents' needs and concerns, rather than just presenting the types of assistance that EPA can provide. It is also important during these meetings for EPA to:

- Inform residents about the role and responsibilities of key Team members.
- Be cautious when answering questions about specific temporary relocation assistance without a complete understanding of each resident's unique needs.

**Communication is a two-way street. EPA staff and community members need to get to know each other. To help make this happen, consider doing the following:**

- Introduce key members of the Temporary Relocation Team—including contractors or other agencies' relocation specialists—at the first public meeting to help residents become familiar with them.
- In addition to holding group meetings with community members and attending community meetings, meet separately with each household that is a candidate for temporary relocation to identify specific relocation needs and to explain the assistance available and the procedures for obtaining it. Uncertainty about the availability of financial support can significantly increase stress and can lead to unnecessary resistance to the relocation.
- Communication techniques that work well in one community may not be effective in others. Avoid a cookie cutter approach.
- Conduct public availability sessions, especially at key milestones in the process, so residents can ask questions in a one-on-one setting.
- Responsibility for the site rests with the OSC/RPM; therefore she or he is strongly encouraged to meet the affected residents and be aware of their individual needs and concerns.

- Avoid suggesting that specific assistance can be provided unless it is clear that the residents will qualify.

Team members should never discuss residents' personal circumstances during public meetings or with other residents. These discussions should be handled during one-on-one interviews. Residents may have someone from outside their household participate in these meetings. This may be especially important for senior citizens who feel more comfortable when a son or daughter is at their side.

## **B. Dealing with Stress and Disruption**

Temporary relocation is a stressful experience and a major disruption to people's lives for many reasons:

- People have to leave their homes, gardens, neighbors, and neighborhoods.
- Residents may have a different and possibly longer commute to work.
- Children may need to be driven to school or bus service may need to be provided.
- The stores people are used to shopping in may no longer be convenient. This can be particularly difficult for the elderly.
- The temporary homes may not be able to accommodate pets.
- Residents may harbor fears about potential exposure to the contamination.
- Once the cleanup is over, people will have to move back and try to re-establish their old connections and routines.

### **Reaching residents living in a large geographic area can be very challenging.**

At a pesticide-contaminated site in Ohio, Region 5 rented a van and equipped it to serve as a mobile community resource center. The van carried all the necessary forms and guidance that residents might need.

This approach might be helpful at other sites to increase community access to important information.

By the time a temporary relocation decision has been made, residents often have been dealing with a variety of site-related concerns for a considerable period of time, including their families' health, loss of their property values, and possible responsibility for damages. These concerns may come on top of personal difficulties people may be facing:

- Couples may be having marital difficulties.
- Families may be trying to cope with a member's drug or alcohol addiction.
- A family member may be experiencing mental or physical health problems.
- An elderly resident may be physically incapacitated.
- Residents may be experiencing financial hardships.

It is important to recognize that dealing with these difficulties may leave residents with relatively little capacity to deal with the additional stress of the relocation. Indeed, for some, the stress of the relocation may be the last straw.

When people's resources are stretched beyond their capacity, they may react unpredictably. EPA and other agency staff or contractors may become the target of residents' reactions even though they may not be the cause of the problem. Residents may become hostile in meetings, have difficulty understanding the explanations offered, be unable to make decisions in a timely manner, and become very anxious or depressed. It is important for the Team to remember that these negative reactions may not be targeted directly at them. Patience and compassion are helpful tools in these situations. Holding regular group meetings or open houses where residents can vent their frustrations can help to relieve the tension. It may be helpful to develop a reference guide for each resident that includes a list of social service providers in the community.

**Helping Residents is More About Listening to Them Rather Than Telling Them What You Can Do**

Region 1 successfully addressed an elderly resident's reluctance to be relocated by taking the time to listen to her carefully. Baffled by her reluctance, Team members met with her several times and eventually understood that she would feel more safe and comfortable staying with her daughter in another state than in temporary housing. Once her feelings were clear, a round trip airline ticket was purchased for her. Arranging for this resident to stay with her daughter reduced her concerns over the temporary relocation and eliminated the need for EPA to find a temporary residence near the site.

**It is important to be consistent when communicating with the public. To ensure this:**

- Limit the number of people who are responsible for contacting residents; the greater the number of people, the more likely that inconsistencies will creep into messages.
- All members of the Team should have the same information as that provided to the community. For example, if residents will not be permitted to return to their homes during the temporary relocation, they should be told this before they move.
- Community support staff should be in place at the time of the notification and application procedures so they can assist in obtaining information about each household and its housing needs. This will help EPA to match each household's needs with the appropriate temporary housing.
- Community support personnel should be available regularly to answer questions and provide support. Availability may be necessary during evenings and weekends when residents are home from work or school.
- To ensure that language barriers do not cause misunderstandings, have translators available if residents speak a different first language. Remember to provide translated written documents.
- Residents who are living in relocation housing should be given the names and phone numbers of EPA contacts, and staff should develop procedures for staying in contact with these relocated residents.
- Remember that communications do not stop once the residents are occupying temporary housing; they only just begin.

**Here are some possible ways to explain the temporary relocation process and assistance available to residents:**

- Provide a site-specific relocation booklet that explains the kinds of assistance available and the logistics of the relocation in an easy-to-understand style. A template for this booklet is available from your OERR Regional Coordinator.
- Hold a series of public availability sessions that provide opportunities for residents to get information about the cleanup, followed by one-on-one individual meetings with each household to allow time for personal questions.
- For large relocations, set up a toll-free number and/or a Web page with information about the clean-up and relocation.
- Place a bulletin board in a central location and post information on the status of the response action. Include the names and phone numbers of key contacts.
- Give each household a binder for relocation documents and information.
- Be sure to explain clearly the proposed clean-up activities and how and when the decision will be made to return the residents to their homes.
- Clearly describe the site conditions residents should expect to find when they return to their homes, especially if additional work on their property or in their neighborhood needs to be done.

### **C. Anticipate the Residents' Needs**

It is important to recognize that temporary relocation disrupts people's lives. Therefore, the Team should make every effort to minimize these difficulties and inconveniences, especially if the relocation is going to last more than a couple of weeks. Besides resolving their relocation issues, other efforts that might ease residents concerns include:

- Helping residents file "Change of Address" forms with their Post Office so their mail will be forwarded to their temporary address during the relocation.
- Helping residents find acceptable accommodations for their pets. (Try to avoid temporary accommodations that require pets be kenneled for many weeks).
- Working with local social service agencies to ensure that any relocation assistance provided to residents is exempt from income considerations for food stamp, Medicaid, and Head Start programs.
- Helping residents connect with local organizations that can provide additional assistance, such as the American Red Cross, the Veterans' Administration, local churches, United Way organizations, and other nonprofit organizations.

The OSC/RPM or ORC also may work with landlords to minimize or prevent the increase of rents after the temporary relocation due to unavoidable improvements made to the rental property during the clean up (contact your Region's OERR Regional Coordinator at Headquarters for additional information).

Finally, it takes time to build a good working relationship with residents. Early and meaningful community involvement is one way to get off to a good start. This will set the tone for future relationships with residents and send a clear message to them that they have a role to play in decisions that affect them. Another way to build trust with residents is to avoid making promises that cannot be kept. Finally, remember that effective community involvement does not mean pleasing everyone all of the time. It may be necessary to "agree to disagree" with residents from time to time.

### **D. Documentation of the Primary Residence and Personal Property**

While the primary goal of any response action is to mitigate the hazards at the site, it is also important to document the condition of personal and real property at the primary residence to prevent or settle disputes, protect everyone involved, and potentially increase residents' satisfaction with the results. The documentation needed depends on the nature and complexity of the response action and the temporary relocation.

Documenting the conditions of property at residential or commercial locations serves the following purposes:

- Provides a record of any pre-existing damage.
- Documents the existence and condition of items that will be disposed of or destroyed during the cleanup.

- Allows for more efficient restoration.
- Provides evidence in case of a dispute.
- Provides a record of any valuables that residents elect to leave behind.

Documentation of any pre-existing damage will allow EPA to determine any responsibility for the cost of repairs. It also can be used in discussions with property owners to settle damage claims. Videos and photographs can be very effective documentation, especially when they are accompanied by a survey of the land contours and drainage.

The following features should be documented in videos or photographs:

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| • Foundations of buildings                               | • Wet or barren areas   |
| • Sidewalks and driveways                                | • Furniture, appliances, and electronic equipment                 |
| • Trees, shrubs, gardens, and other landscaping features | • Interior walls, wood work, carpets and other flooring           |
| • Sprinkler systems and drainage pipes                   | • Visible cracks in the walls, or inside or outside the structure |
| • Pots, ornaments, and other detached fixtures           | • Window air conditioning units and central heating/cooling units |
| • Patio furniture and playground equipment               | • Dog houses  |
| • Fences and gates                                       | • Any other significant conditions or damage                      |
| • Lights   |   |
| • Exposed piping and plumbing                            |   |

It also is advisable to check electrical outlets, water spigots, and natural gas connections to ensure that they are in working condition. This information also can be recorded with video and photographs.

When videotaping, move the camera slowly to cover the entire area. As you film, talk into the camera's microphone to provide a detailed description of what you are filming. Whenever possible, ask the residents to participate in the video/audio recording. Describe the location of the camera and the direction from which the picture is being taken. This information also can be recorded in a logbook, and a map showing the general layout of the yard and the location of the camera can be included.

All appliances and electronic equipment in the homes should be checked to see if they are running properly during the documentation phase. Regions should consider videotaping the interiors of each home even if the cleanup may not require working inside the homes. This will help protect EPA and residents against future damage claims. The videotape footage of each residence should be accompanied by a catalog of the items videotaped, which could include the model numbers of electrical equipment, sales receipts, and other important information. Items

can be grouped together when videotaping or photographing them, but all items to be appraised should be fully visible, and their condition should be apparent in the videotapes or photographs.

When EPA assumes responsibility for reimbursing residents for items that will be disposed of or destroyed during the site cleanup, it is particularly important to gather sufficient documentation to allow for the proper appraisal of their value. Where interiors of buildings will be involved in the cleanup, appraisers may not be allowed to enter because of contamination. Thus, videos/photos of the interior and its contents can be useful tools for the appraiser.

For unique items, it is important that a value be established by an independent appraiser. Historically, EPA has used the services of local appraisers, as well as appraisers made available by the USACE. The type of appraisal expertise necessary may depend on the cost and uniqueness of the item being appraised. Once an independent appraiser establishes an appraised value, the Region should not make adjustments to the value without cause. For example, a resident may disagree with the appraised value and provide substantive support for their position. The Region then could agree to adjust the appraised value. The Team also can provide for the full replacement value of certain essential items (see Attachment 8 for a list of essential furniture items).

In addition to the videotape and photographs, documentation can include actual samples of the material that was removed. Small squares of carpet, wallpaper, cabinets, floor tile, and molding can be stored in sealed plastic bags to show their quality or color (videos and photographs do not always show the correct color or texture). Bags should be labeled to identify the sample, which residence it came from, and where in the residence it came from. These samples and the photo-documentation should be made available to the restoration contractor. It can be helpful to have a combination TV/VCR available at the residence so contractors can view the videos as the restoration progresses.

View the entire videotape and have photographs developed to make sure the images are clear and captured the necessary details before work begins. A sample form that can be used for recording this information can be found in Attachment 9, "Personal Property Appraisal Record."

## **E. Site Security**

Some residents may be reluctant to move temporarily if they fear that their property (both real and personal) may be vulnerable to vandals, fire, or other damage. The Team should describe to residents the security that will be provided at the site, and remind residents whenever practicable to take valuables—including those of sentimental value—with them when they move. Residents also should be reminded that they are responsible for maintaining existing insurance at their primary residence.

Providing site security can help residents build their confidence in EPA and ease their reluctance to move. OSCs and RPMs should make a site-specific decision regarding the type of security that will be provided and acknowledge that not all sites need the same level of security. OSC/RPMs should evaluate the following factors when making decisions about site security:

- Insurance companies may cancel an existing policy or raise the policy rates if a building is expected to be unoccupied for a lengthy period of time. The amount of the increase in insurance rates may be a reimbursable out-of-pocket expense.
- Residents may have particularly valuable or meaningful personal property that can be placed in a safety deposit box rather than being left behind at the primary residence or moved to the temporary residence. A reasonable fee for a safety deposit box may be considered a reimbursable out-of-pocket expense.
- Media attention that mentions relocation may spark the interest of burglars, especially when large blocks of unoccupied homes are involved.
- Residents may feel that their homes and personal property are irreplaceable.
- Residents, especially tenants, may not have insurance.
- Residents may want to return to their homes during the response action to check for problems if the area is not secured. In some cases, it may be difficult or impossible to allow residents to return to their homes.

Site security may include:

- Installing alarms in unoccupied homes.
- Working with the local police to arrange for increased patrol in the area.
- Arranging for a security guard or police officer to be on-site whenever there are no response personnel working at the site.



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arrangements for transportation to be provided. Regions should take great care to make sure standards are in place when selecting drivers and vans.<sup>2</sup>

If the resident elected to move to a temporary residence that is farther from schools or work than a location EPA provided, EPA should not be responsible for any additional transportation costs beyond those associated with the temporary residence offered by EPA.

## **H. Damaged or Contaminated Personal Property**

Costs associated with damaged or contaminated personal property are not a temporary relocation expense, but they often occur at sites where EPA is conducting a temporary relocation. In general, EPA has the discretion to compensate residents for personal property that is damaged in the course of the cleanup or that cannot be decontaminated. In most situations, EPA should provide replacement value for essential furniture items (see Attachment 8 for a list of essential furniture items) and depreciated value for non-essential personal property.

Several methods can be used to reimburse residents. A third party draft can be used for reimbursement up to \$5,000. Treasury checks can be issued for larger amounts. Issuing treasury checks may take time because there is a built in time delay in EPA's procurement procedures. The Team should work with their financial management office to determine if treasury checks are feasible and if they can be issued in a timely manner. This guidance, however, is not intended to fully outline the assistance available to compensate residents for contaminated personal property. Contact the OERR Regional Coordinator for assistance. Additional guidance on funding options is available in the "On-Scene Coordinators Toolbox Guide," EPA Directive 9242.2-12, EPA Publication 540-K-00-003.

## **I. Reimbursement for Non-Residential Relocations**

Temporarily relocating farms, nonprofit organizations, businesses with special permits (such as bars and hotels), or large or specialized operations can have devastating effects on their success. Therefore, the OSC/RPM should explore every available option to avoid temporarily relocating them. However, if these types of businesses have to close down temporarily during a response action, they may be entitled to some assistance. ORC and the Region's OERR Regional Coordinator should work with OGC to determine what assistance, if any, can be provided.

Other types of businesses may be easier to temporarily relocate. For example, if a relocated resident had set aside part of his/her residence to operate a small business and had phone or fax lines, EPA may provide such arrangements at the temporary residence. Determinations for the types of relocation assistance EPA can provide are made on a case-by-case basis, and consider factors such as essential equipment needed to continue operation, special hook-ups,

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<sup>2</sup> Bus driver qualifications and standards are established by state and federal regulations. All drivers must comply with federal regulations and any state regulations that exceed federal requirements. At a minimum, the Team should insist that school bus drivers pass a background investigation to uncover any criminal convictions or a history of mental illness. Drivers must not have been convicted of a felony involving the use of a motor vehicle; a crime involving drugs; or driving under the influence of drugs or alcohol. The Team may want to consult with the local school board for additional advice. Additional information is also available in the US Department of Labor's Occupational Outlook Handbook, <http://www.bls.gov/oco/ocos242.htm#training>.

disconnections, and the potential for CERCLA liability of the business for the contamination. Costs associated with loss of goodwill, loss of profits, and loss of trained employees are not reimbursable. It is EPA's policy to provide business owners the same opportunity for the resolution of disputes as provided to residents. See Section VIII, "Termination of Assistance and Resolution of Disputes."

Assistance for non-residential relocations is different from assistance for residential relocations. The URA includes caps on certain types of assistance. This guidance document is not intended to fully outline the assistance available for non-residential relocations. The Temporary Relocation Team should work with OGC/ORC, the Region's OERR Regional Coordinator, and relocation specialists from the supporting agencies to determine the appropriate scope of relocation assistance for each non-residential operation requiring relocation.

#### **J. Other Expenses Directly Related to Relocation**

When appropriate, the Temporary Relocation Team may determine that other potential expenses directly related to the temporary relocation are eligible expenses. These expenses should be approved by the Team before costs have been incurred. In making determinations about other eligible expenses, the Team may consult ORC and/or their Headquarters Regional Coordinator for assistance.

#### **K. General Requirements for Reimbursement of Expenses**

During a temporary relocation, residents should incur expenses and seek reimbursement from EPA. Any claim for reimbursement made by residents during a temporary relocation should be supported with bills, receipts, certified prices, appraisals, or other documentation. EPA should provide reasonable assistance in the completion and filing of any required claims for reimbursement to persons temporarily relocated. It is important to keep the following requirements in mind when dealing with requests for reimbursement:

- *Timeliness of EPA reviews*—EPA should review claims in an expeditious manner and promptly notify claimants if additional documentation is needed to support their claims. Payment for a claim should be made as soon as feasible after the supporting documentation has been received.
- *Timeliness of claim filing*—It is EPA's policy that all claims for relocation reimbursements should be filed with EPA/PRP within four months of the date that residents are allowed to return to their primary residence. This deadline can be extended; however, if residents can show the need. Residents should be notified of all deadlines in writing.
- *EPA disapproval of claims*—If EPA disapproves all or part of a claim for reimbursement for any reason (e.g., the claim was not filed in a timely manner, residents requested reimbursement for ineligible goods or services), the Agency should promptly notify the claimant in writing of its decision, of the basis for its decision, and the procedures for additional review of the dispute by an EPA official not involved in the response action at the site (see Section VIII, "Termination of Assistance and Resolution of Disputes"). This written notice should be sent via certified mail.